

EXHIBIT 7

From: [Babchinetskaya, Izabella \(Phila\)](#)

Sent: Monday, October 10, 2022 10:58:00 AM

To: [Powell, Courtney](#)

Cc: [Leckerman, Jason \(Phila\)](#); [Gavin, Laura \(Phila\)](#); [Swaminathan, Lisa B. \(Phila\)](#); [Jonathan Irwin](#); [Tianna Mays](#); [Woody Glass](#); [Ferate, AJ](#); [Lester, Andy](#); [Davies, Shannon](#); aago@lawyerscommittee.org

Bcc: [Hatza, Nikki \(Phila\)](#); [Watson, Travis W. \(Phila\)](#); [00330363 _ Oklahoma County Investigation Debtor's Prison _ E_Mail](#)

Subject: RE: Hill et al. v. Town of Valley Brook

Sensitivity: Normal

Courtney,

We have yet to receive any substantive responses to our deficiency letter, which we requested by October 3, 2022, including but not limited to electronic reports or documents covered by the protective order.

Best,
Izabella

From: Powell, Courtney <cpowell@spencerfane.com>

Sent: Thursday, September 29, 2022 9:57 PM

To: Babchinetskaya, Izabella (Phila) <Babchinetskayal@ballardspahr.com>

Cc: aago@lawyerscommittee.org; [Tianna Mays <tmays@lawyerscommittee.org>](mailto:tmays@lawyerscommittee.org); [Jonathan Irwin <Jonathan@wardglasslaw.com>](mailto:JonathanIrwin@wardglasslaw.com); [Leckerman, Jason \(Phila\) <LeckermanJ@ballardspahr.com>](mailto:LeckermanJ@ballardspahr.com); [Woody Glass <woody@wardglasslaw.com>](mailto:WoodyGlass@wardglasslaw.com); [Swaminathan, Lisa B. \(Phila\) <SwaminathanL@ballardspahr.com>](mailto:SwaminathanL@ballardspahr.com); [Gavin, Laura \(Phila\) <gavinl@ballardspahr.com>](mailto:GavinL@ballardspahr.com)

Subject: RE: Hill et al. v. Town of Valley Brook

⚠ EXTERNAL

Izabella - I apologize for not getting to this earlier today. I was traveling most of the day. I have not received any additional documentation. They were still copying the first year when I met with them last week. The electronic reports should be available by mid-next week.

Courtney

Courtney Powell Of Counsel
Spencer Fane LLP

9400 N. Broadway Ext., Suite 600 | Oklahoma City, OK 73114
O 405.753.5915
cpowell@spencerfane.com | spencerfane.com

From: Babchinetskaya, Izabella <Babchinetskayal@ballardspahr.com>

Sent: Thursday, September 29, 2022 10:13 AM

To: Powell, Courtney <cpowell@spencerfane.com>

Cc: [Holcum, Laura <Holcum@spencerfane.com>](mailto:Holcum@spencerfane.com); aago@lawyerscommittee.org; [Tianna Mays <tmays@lawyerscommittee.org>](mailto:tmays@lawyerscommittee.org); [Jonathan Irwin <Jonathan@wardglasslaw.com>](mailto:JonathanIrwin@wardglasslaw.com); [Leckerman, Jason <LeckermanJ@ballardspahr.com>](mailto:LeckermanJ@ballardspahr.com); [Woody Glass <woody@wardglasslaw.com>](mailto:WoodyGlass@wardglasslaw.com); [Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>](mailto:SwaminathanL@ballardspahr.com); [Gavin, Laura <gavinl@ballardspahr.com>](mailto:GavinL@ballardspahr.com)

Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook

[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.

Courtney,

Please see the attached correspondence. As noted in the letter, you indicated that you would provide us with a status update on the ticket jackets by this past Saturday. We are still waiting on that update, as well as electronic documents we discussed during our meet and confer last week and documents withheld pending a protective order, which was signed by the Court on Monday.

Thank you,
Izabella

From: Babchinetskaya, Izabella (Phila)

Sent: Thursday, September 22, 2022 3:29 PM

To: 'Powell, Courtney' <cpowell@spencerfane.com>

Cc: 'Holkum, Laura' <lholkum@spencerfane.com>; 'aago@lawyerscommittee.org' <aago@lawyerscommittee.org>; 'Tianna Mays' <tmays@lawyerscommittee.org>; 'Jonathan Irwin' <Jonathan@wardglasslaw.com>; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; 'Woody Glass' <woody@wardglasslaw.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>

Subject: RE: Hill et al. v. Town of Valley Brook

Hi Courtney,

Thank you for talking to us this afternoon. To summarize the call, we initially discussed ticket jackets and electronic forms. You indicated that you would be able to produce electronic forms in about a week, and that you would follow up with us by Saturday morning to provide an update on the copying of a year's worth of ticket jackets. You also agreed that you would produce the ticket jackets on a rolling basis.

We also discussed the Protective Order. You confirmed that we have your permission to add your signature to the filing. You also confirmed that Defendants would produce the documents that were withheld pending a protective order.

Thank you,
Izabella

From: Babchinetskaya, Izabella (Phila)

Sent: Tuesday, September 20, 2022 11:03 AM

To: 'Powell, Courtney' <cpowell@spencerfane.com>

Cc: Holcum, Laura <lholkum@spencerfane.com>; aago@lawyerscommittee.org; Tianna Mays <tmays@lawyerscommittee.org>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Woody Glass <woody@wardglasslaw.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>

Subject: RE: Hill et al. v. Town of Valley Brook

Courtney,

Please let us know if we have authorization to add your signature to the motion. We will then get the Protective Order filed. Please also confirm that Defendants will immediately produce the documents withheld pending a protective order, as referenced in Defendants' Amended Responses.

Finally, our team is available for a call this Thursday at 2 pm ET. We'll send an invitation, but let us know if that doesn't work.

Thank you,
Izabella

From: Powell, Courtney <cpowell@spencerfane.com>
Sent: Monday, September 19, 2022 4:41 PM
To: Babchinetskaya, Izabella (Phila) <Babchinetskayal@ballardspahr.com>
Cc: Holcum, Laura <lholkum@spencerfane.com>; aago@lawyerscommittee.org; Tianna Mays <tmays@lawyerscommittee.org>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Woody Glass <woody@wardglasslaw.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>
Subject: RE: Hill et al. v. Town of Valley Brook

⚠ EXTERNAL

We are in agreement with the protective order.

I apologize for the issue regarding the Sharefile – there was a typographical error in entering your email address. We will work to ensure that it does not occur again.

As noted in my previous email, we need to set up a call regarding the time and expense in producing the original time jackets. We can produce electronic reports containing the same information that would be more efficient in production.

I am unavailable tomorrow or Wednesday morning. My availability is more open Thursday and Friday.

Courtney Powell Of Counsel
Spencer Fane LLP

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From: Babchinetskaya, Izabella <Babchinetskayal@ballardspahr.com>
Sent: Monday, September 19, 2022 8:21 AM
To: Powell, Courtney <cpowell@spencerfane.com>
Cc: Holcum, Laura <lholkum@spencerfane.com>; aago@lawyerscommittee.org; Tianna Mays <tmays@lawyerscommittee.org>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Leckerman, Jason <LeckermanJ@ballardspahr.com>; Woody Glass <woody@wardglasslaw.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>
Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook

[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.

Courtney,

We have yet to receive a response from defendants. Please provide us with an update on the ticket jackets, as well as the protective order.

Thank you,
Izabella

From: Babchinetskaya, Izabella (Phila)

Sent: Monday, September 12, 2022 11:00 AM

To: 'Powell, Courtney' <cpowell@spencerfane.com>

Cc: Holcum, Laura <lholkum@spencerfane.com>; aago@lawyerscommittee.org; Tianna Mays <tmays@lawyerscommittee.org>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Woody Glass <woody@wardglasslaw.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>

Subject: RE: Hill et al. v. Town of Valley Brook

Courtney,

Your email below references a complete response that you intended to circulate by Friday. I did not receive another email from you. Please let us know when to expect that response. Also, several members on our team received a Sharefile link with a supplemental production, but I did not. For any future productions, please make sure to include all of plaintiffs' counsel.

In addition, your email references ticket jackets that are in the process of being copies. Please let us know when you expect the copying to be complete.

Finally, I'm re-attaching the protective order that we circulated on August 25, 2022 for your comments and review.

Thank you,
Izabella

From: Powell, Courtney <cpowell@spencerfane.com>

Sent: Thursday, September 8, 2022 7:23 PM

To: Babchinetskaya, Izabella (Phila) <BabchinetskayaI@ballardspahr.com>; aago@lawyerscommittee.org; Tianna Mays <tmays@lawyerscommittee.org>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Woody Glass <woody@wardglasslaw.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>

Cc: Holcum, Laura <lholkum@spencerfane.com>

Subject: RE: Hill et al. v. Town of Valley Brook

EXTERNAL

Izabella –

I am working through your email and will have a complete response tomorrow. However, I did realize that the link I sent did not include all of the documents. I'm not sure what happened and am reviewing. I will be sending (by separate e-mail) a link to a shared Sharefile that will contain the documents sent Tuesday, amended responses, and an additional set of documents.

I am still receiving documents from the client and will supplement as they come in. We need to discuss the production of copies of the original jackets. The 5 year scopes yields multiple banker boxes worth of information that will need to be (and are in the process of) being copied. There is no electronic copy – only a hard paper copy. There are electronic alternatives that will contain the same information and would speed up the production process.

Courtney

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From: Powell, Courtney

Sent: Tuesday, September 6, 2022 9:43 PM

To: Babchinetskaya, Izabella <Babchinetskayal@ballardspahr.com>; aago@lawyerscommittee.org; Tianna Mays <tmays@lawyerscommittee.org>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Leckerman, Jason <LeckermanJ@ballardspahr.com>; Woody Glass <woody@wardglasslaw.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>

Cc: Holcum, Laura <lholkum@spencerfane.com>

Subject: Hill et al. v. Town of Valley Brook

Please see the below link:

<https://spencerfane.sharefile.com/d-s2928236061b94ca7be1176f22540a54e>

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